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DOCKET FILE COPY ORIGINAL

November 15, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RECEIVED
NOV 15 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: The Independent Telephone Companies
CC Docket No. 98-170
Supplement to Petition for Temporary, Limited Waiver
Filed November 12, 1999

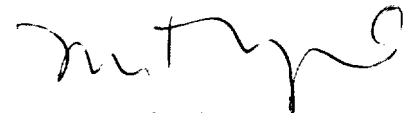
Dear Ms. Salas:

On behalf of Fulton Telephone Company, Mound Bayou Telephone and Communications, Inc., Chickamauga Telephone Corporation, Diamond Telephone Services, Inc., and Gulf Pines Communications, LLC, we are transmitting the Declaration of Eric E. Lindstrom, Jr. bearing an original signature. On November 12, 1999, the referenced Supplement was filed with the Declarations bearing facsimile signatures.

Please associate the Declarations with the captioned Petition.

Should you have any questions, please contact this office.

Very truly yours,



Margaret Nyland

Attachments

No. of Copies rec'd
List ABCDE

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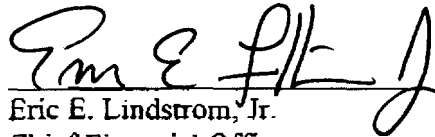
FULTON TELEPHONE COMPANY

Fulton Telephone Company (the "Company") provides exchange and exchange access services to approximately 8,850 lines in Mississippi. The Company is a member of the United States Telecom Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Communications Data Group ("CDG") for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company is concentrating its efforts on Year 2000 issues. In June, 1999, the Company contacted CDG with respect to the FCC's Truth-in-Billing ("TIB") requirements. CDG informed the Company by memorandum dated November 3, 1999, that it will not be capable of providing the necessary software updates required to comply with the TIB inquiry contact and separate provider requirements at this time. Specifically, the need for this waiver arises in light of the fact that the Company currently provides billing and collection services for casual calling and alternate service providers and that the Company is not yet capable of listing inquiry contacts on bills for these providers. In addition, this waiver is necessary because the non-recurring charges and credits for the carriers for which the Company provides 1+ billing and collection services currently are aggregated with other non-recurring charges and credits in the local service section of the Company's bill, and the Company is not yet capable of separating these credits and charges by service provider. Accordingly, the Company requests that these TIB requirements be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF ERIC E. LINDSTROM, JR.

I, Eric E. Lindstrom, Jr., Chief Financial Officer of Fulton Telephone Company ("Fulton"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver," filed November 10, 1999, and the information contained therein describes the status of Fulton's TIB compliance and is true and accurate to the best of my knowledge, information, and belief.

Date 11/11/99


Eric E. Lindstrom, Jr.
Chief Financial Officer

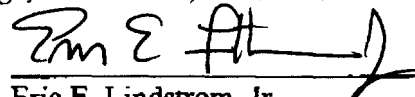
MOUND BAYOU TELEPHONE AND COMMUNICATIONS, INC.

Mound Bayou Telephone and Communications, Inc. (the "Company") provides exchange and exchange access services to approximately 1,020 lines in Mississippi. The Company is a member of the United States Telecom Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Communications Data Group ("CDG") for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company is concentrating its efforts on Year 2000 issues. In June, 1999, the Company contacted CDG with respect to the FCC's Truth-in-Billing ("TIB") requirements. CDG informed the Company by memorandum dated November 3, 1999, that it will not be capable of providing the necessary software updates required to comply with the TIB inquiry contact and separate provider requirements at this time. Specifically, the need for this waiver arises in light of the fact that the Company currently provides billing and collection services for casual calling and alternate service providers and that the Company is not yet capable of listing inquiry contacts on bills for these providers. In addition, this waiver is necessary because the non-recurring charges and credits for the carriers for which the Company provides 1+ billing and collection services currently are aggregated with other non-recurring charges and credits in the local service section of the Company's bill, and the Company is not yet capable of separating these credits and charges by service provider. Accordingly, the Company requests that these TIB requirements be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF ERIC E. LINDSTROM, JR.

I, Eric E. Lindstrom, Jr., Chief Financial Officer of Mound Bayou Telephone and Communications, Inc. ("Mound Bayou"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver," filed November 10, 1999, and the information contained therein describes the status of Mound Bayou's TIB compliance and is true and accurate to the best of my knowledge, information, and belief.

Date 11/11/99


Eric E. Lindstrom, Jr.
Chief Financial Officer

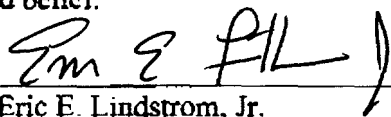
CHICKAMAUGA TELEPHONE CORPORATION

Chickamauga Telephone Corporation (the "Company") provides exchange and exchange access services to approximately 6,750 lines in Georgia. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Communications Data Group ("CDG") for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company is concentrating its efforts on Year 2000 issues. In June, 1999, the Company contacted CDG with respect to the FCC's Truth-in-Billing ("TIB") requirements. CDG informed the Company by memorandum dated November 3, 1999, that it will not be capable of providing the necessary software updates required to comply with the TIB inquiry contact and separate provider requirements at this time. Specifically, the need for this waiver arises in light of the fact that the Company currently provides billing and collection services for casual calling and alternate service providers and that the Company is not yet capable of listing inquiry contacts on bills for these providers. In addition, this waiver is necessary because the non-recurring charges and credits for the carriers for which the Company provides l+ billing and collection services currently are aggregated with other non-recurring charges and credits in the local service section of the Company's bill, and the Company is not yet capable of separating these credits and charges by service provider. Accordingly, the Company requests that these TIB requirements be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF ERIC E. LINDSTROM, JR.

I, Eric E. Lindstrom, Jr., Chief Financial Officer of Chickamauga Telephone Corporation ("Chickamauga"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver," filed November 10, 1999, and the information contained therein describes the status of Chickamauga's TIB compliance and is true and accurate to the best of my knowledge, information, and belief.

Date 11/11/99


Eric E. Lindstrom, Jr.
Chief Financial Officer

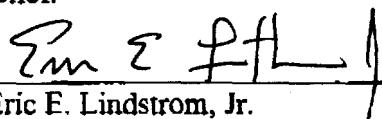
DIAMOND TELEPHONE SERVICES, INC.

Diamond Telephone Services, Inc. (the "Company") provides exchange and exchange access services to approximately 400 lines in Mississippi. The Company utilizes Communications Data Group ("CDG") for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company is concentrating its efforts on Year 2000 issues. In June, 1999, the Company contacted CDG with respect to the FCC's Truth-in-Billing ("TIB") requirements. CDG informed the Company by memorandum dated November 3, 1999, that it will not be capable of providing the necessary software updates required to comply with the TIB inquiry contact and separate provider requirements at this time. Specifically, the need for this waiver arises in light of the fact that the Company currently provides billing and collection services for casual calling and alternate service providers and that the Company is not yet capable of listing inquiry contacts on bills for these providers. In addition, this waiver is necessary because the non-recurring charges and credits for the carriers for which the Company provides 1+ billing and collection services currently are aggregated with other non-recurring charges and credits in the local service section of the Company's bill, and the Company is not yet capable of separating these credits and charges by service provider. Accordingly, the Company requests that these TIB requirements be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF ERIC E. LINDSTROM, JR.

I, Eric E. Lindstrom, Jr., Chief Financial Officer of Diamond Telephone Services, Inc. ("Diamond"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver," filed November 10, 1999, and the information contained therein describes the status of Diamond's TIB compliance and is true and accurate to the best of my knowledge, information, and belief.

Date 11/11/99


Eric E. Lindstrom, Jr.
Chief Financial Officer

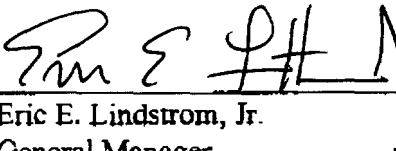
GULF PINES COMMUNICATIONS, LLC

Gulf Pines Communications, LLC (the "Company") provides exchange and exchange access services to approximately 500 lines in Mississippi. The Company utilizes Communications Data Group ("CDG") for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company is concentrating its efforts on Year 2000 issues. In June, 1999, the Company contacted CDG with respect to the FCC's Truth-in-Billing ("TIB") requirements. CDG informed the Company by memorandum dated November 3, 1999, that it will not be capable of providing the necessary software updates required to comply with the TIB inquiry contact and separate provider requirements at this time. Specifically, the need for this waiver arises in light of the fact that the Company currently provides billing and collection services for casual calling and alternate service providers and that the Company is not yet capable of listing inquiry contacts on bills for these providers. In addition, this waiver is necessary because the non-recurring charges and credits for the carriers for which the Company provides 1+ billing and collection services currently are aggregated with other non-recurring charges and credits in the local service section of the Company's bill, and the Company is not yet capable of separating these credits and charges by service provider. Accordingly, the Company requests that these TIB requirements be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF ERIC E. LINDSTROM, JR.

I, Eric E. Lindstrom, Jr., General Manager of Gulf Pines Communications, LLC ("Gulf Pines"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver," filed November 10, 1999, and the information contained therein describes the status of Gulf Pines's TIB compliance and is true and accurate to the best of my knowledge, information, and belief.

Date 11/11/99


Eric E. Lindstrom, Jr.
General Manager